

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

WILLIAM CLARKE,
Defendant.

Criminal No. 1:14-CR-246

Hon. Claude M. Hilton

Trial Date: February 23, 2015

GOVERNMENT’S RULE 16(a)(1)(G) NOTICE

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and Rules 702, 703, and 705 of the Federal Rules of Evidence, the United States hereby notices its intent to use expert testimony. The United States may call Herndon Detective Michael Croson as an expert witness identified as discussed below. The statement of expert qualifications for Detective Croson has been provided to defense counsel. Those qualifications, along with review of relevant reports, facts, and evidence, set forth the bases for his opinions.

Detective Croson is employed as a Detective with the Herndon Criminal Investigative Service, and he is assigned to the High Tech Crimes Unit and the Internet Crimes Against Children Task Force. He has been certified as a Cellbrite Logical Operator and Cellbrite Physical Analyst. Detective Croson is expected to provide testimony relating to the computer forensic examination of computer equipment that he conducted in connection with the investigation into William Clarke, specifically he will testify about his review of William Clarke’s iPhone (Model Number: A1387, FCC ID Number: BCG-E2430A) using Cellbrite.

Detective Croson’s testimony will involve his technical and specialized knowledge regarding the forensic examination of computer equipment. Detective Croson is expected to

The United States has provided the defense with access to the Cellbrite image of Clarke's iPhone and will continue to accommodate any reasonable request by the defense to review that image.

Respectfully submitted,

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF, which will then send a notification of such filing (NEF) to the following:

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